

**From:** "Ross Harrison" <bmc@socket.net> on 02/18/2005 11:26:55 AM

**Subject:** EGRPRA

Bank of Montgomery County, Wellsville, MO

We are drowning in BSA-CIP-314A-Patriot Act requirements.

Since Oct 2003, we have spent approximately two man-years of energy creating what I call a "dossier" on each of our new customers and many of our old customers just to make sure we are in compliance.

The intent from your anti-terrorist point of view is great.

The application begs for common sense.

We are a county of 12,000 people. If someone walks into our small town of 1500, we all gawk and strain our necks and then ask each other, and who is it? Why are they in town? What are they up to? The need for dossiers on BMC customers is a silly requirement. We grow up with them, we go to church with them, we do business with them.....and if we don't we all spend a lot of time trying to figure out who they are.

How much good could a small community bank do with 2 man-years of time devoted to something else?

I have 21 full-time employees and am stressed to meet the volumes of requirements. How does a small country bank with 5-10 employees manage all these requirements?

We are now requiring each employee to take a 2-4 hour class on-line so that we can say we complied and trained our staff. What could my employees be doing with that 2-4 hours to improve asset quality, take care of customers, etc, etc, etc.

There should be an exemption for banks under \$100mm in communities of less than 25,000.....or some similar rule that reduces this madness.

Thanks for listening.

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